

EXHIBIT A

From: [Freyman, Anna J.](#)
To: [#Microsoft.NYClassAction.FDBR](#); ["nyclassactions_microsoft_ohs@orrick.com"](#)
Cc: ["Alter-AI-TT@simplelists.susmangodfrey.com"](#)
Subject: RE: [EXT] RE: AG v. OAI - Discovery Status Letter - Request for M&C
Date: Thursday, February 13, 2025 4:50:08 PM

This Message originated outside your organization.

Counsel,

Based on documents we have reviewed, it appears that Microsoft provided web crawling data to OpenAI and that the crawler data captured books datasets. At next week's conferral, in addition to the items listed in our February 4 letter, please be prepared to discuss making the crawler data that Microsoft acquired available for inspection by Plaintiffs.

Thank you.

**Lieff
Cabraser
Heimann &
Bernstein**
Attorneys at Law

Anna J. Freyman
Attorney at Law
afreyman@lchb.com
t 212.355.9500
f 212.355.9592
Lieff Cabraser Heimann & Bernstein, LLP
250 Hudson Street, 8th Floor
New York, NY 10013
www.lieffcabraser.com

From: Scheibel, Elizabeth M.C. <elizabeth.scheibel@faegredrinker.com>
Sent: Wednesday, February 12, 2025 10:16 AM
To: Freyman, Anna J. <afreyman@lchb.com>; #Microsoft.NYClassAction.FDBR
<MicrosoftNYClassActionFDBR@faegredrinker.com>; 'nyclassactions_microsoft_ohs@orrick.com'
<nyclassactions_microsoft_ohs@orrick.com>
Cc: 'Alter-AI-TT@simplelists.susmangodfrey.com' <Alter-AI-TT@simplelists.susmangodfrey.com>
Subject: [EXT] RE: AG v. OAI - Discovery Status Letter - Request for M&C

Hi Anna-

We can do Tuesday the 18th at 4:30pm ET. Thanks!
Liz

Elizabeth M.C. Scheibel

Associate

Pronouns: she/her/hers

elizabeth.scheibel@faegredrinker.com

Connect: [vCard](#) / [LinkedIn](#)

+1 612 766 7628 direct

Faegre Drinker Biddle & Reath LLP

2200 Wells Fargo Center, 90 South Seventh Street
Minneapolis, Minnesota 55402, USA

From: Freymann, Anna J. <afreymann@lchb.com>
Sent: Tuesday, February 11, 2025 11:45 AM
To: #Microsoft.NYClassAction.FDBR <MicrosoftNYClassActionFDBR@faegredrinker.com>;
'nyclassactions_microsoft_ohs@orrick.com' <nyclassactions_microsoft_ohs@orrick.com>
Cc: 'Alter-AI-TT@simplelists.susmangodfrey.com' <Alter-AI-TT@simplelists.susmangodfrey.com>
Subject: RE: AG v. OAI - Discovery Status Letter - Request for M&C

This Message originated outside your organization.

Counsel:

We would like to schedule a meet and confer to discuss the issues set forth in our February 4 letter.
We are available as follows:

- Friday, Feb. 14, at 3 or 3:30 pm ET
- Tuesday, Feb. 18, at 4 or 4:30 pm ET

As stated in the letter, we would like to set aside 1.5 h for the call.

Please let us know what time would work best for you.

Thank you.

**Lieff
Cabraser
Heimann &
Bernstein**
Attorneys at Law

Anna J. Freymann
Attorney at Law
afreymann@lchb.com
t 212.355.9500
f 212.355.9592
Lieff Cabraser Heimann & Bernstein, LLP
250 Hudson Street, 8th Floor
New York, NY 10013
www.lieffcabraser.com

From: Freymann, Anna J.
Sent: Tuesday, February 4, 2025 5:37 PM
To: #Microsoft.NYClassAction.FDBR <MicrosoftNYClassActionFDBR@faegredrinker.com>;
'nyclassactions_microsoft_ohs@orrick.com' <nyclassactions_microsoft_ohs@orrick.com>
Cc: Alter-AI-TT@simplelists.susmangodfrey.com
Subject: AG v. OAI - Discovery Status Letter - Request for M&C

Counsel:

Please see attached Plaintiffs' discovery status letter re. Microsoft's Supplemental Responses to

Plaintiffs' Second Set of RFPs, and other discovery related issues.

Best regards,
Anna

**Lieff
Cabraser
Heimann &
Bernstein**
Attorneys at Law

Anna J. Freymann
Attorney at Law
afreymann@lchb.com
t 212.355.9500
f 212.355.9592
Lieff Cabraser Heimann & Bernstein, LLP
250 Hudson Street, 8th Floor
New York, NY 10013
www.lieffcabraser.com

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